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April 19, 2022

Hon. Lewis J. Liman  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 701  
New York, NY 10007

Re: Case name Red v. Lam Platt Street Hotel, LLC v Skyteam  
Docket # 1:19-cv-04992 LJL  
Request for Adjournment of: (1) Joint Pre-trial Order; (2) Pretrial  
Conference; and (3) Trial Date

Dear Judge Liman,

It is respectfully requested upon consent of all parties by their respective counsel (enumerated and copied as set forth below) that upon counsel's inquiry as to the status of the pending Summary Judgment motions and after being advised by the law clerks for both Magistrate Judge Jennifer E. Willis (Brook Gottlieb, Esq.) and Your Honor (Katie) that there have been no published Decisions regarding the Defendants' and Third Party Defendant's respective motions for Summary Judgment, that in the interests of the Court and the parties that the presently scheduled dates for the filing of the Joint Pre-trial Order, presently set for April 29, 2022; Pre-trial Conference scheduled for May 12, 2022; and Trial Date scheduled for May 16, 2022 be adjourned.

Were these presently scheduled dates not to be adjourned the parties and their respective counsel, particularly the Plaintiffs, are immediately faced with deadlines whereby they will incur substantial non-refundable expense reserving dates for their medical orthopedic expert(s) to testify, presentation of trial exhibits and graphics for presentation during trial, and in the instance of the Plaintiffs' (who reside and work in Louisiana) having to advance the cost for non-refundable airfare and lodging reservations for themselves and their daughter, when the potential for any meaningful pre-trial settlement discussions remain in abeyance, and likely dependent upon the Court's Decisions on the pending motions.

Once the pending motions are decided the parties may be better positioned to discuss possible settlement without having incurred these substantial expenses, which once incurred, negatively affect opportunity for settlement.

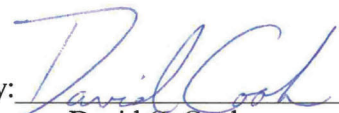
We trust the Court will agree that the economic benefits to the Court and the parties, including time and money, support the need to set new dates for the filing of the Joint Pre-Trial Order, Pre-Trial Conference, and Trial Date.

Counsel requests the Trial Date be adjourned until September 2022, assuming Decisions on the Summary Judgment Motions are issued before then, and the Joint Pre-Trial Order and Pre-Trial Conference be set to track the Trial Date.

We thank the Court for its courtesy and cooperation in granting the requested adjournments.

Respectfully submitted,

KREINDLER & KREINDLER LLP


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The request is GRANTED in part and DENIED in part. The trial is adjourned to June 15, 2022. The final pre-trial conference will take place on Friday, June 10, 2022 at 2:30 p.m. in Courtroom 15C of the 500 Pearl Street Courthouse. The joint pre-trial order is due by May 27, 2022.

SO ORDERED.

  
LEWIS J. LIMAN  
United States District Judge

4/21/2022